

September 6, 2016

United States Environmental Protection Agency
805 SW Broadway
Suite 500
Portland, OR 97205
Attn: Harbor Comments

Re: Proposed Cleanup Plan for the Portland Harbor Superfund Site

Please accept this letter on behalf of the Metro Council, the elected, nonpartisan government for the greater Portland region. We represent more than 1.5 million people in 24 cities and three counties. We work on transportation, environmental quality, job growth and other issues that cross local boundaries.

Our primary request is for a timely decision that creates certainty for the Portland region's people, local governments and landowners and that protects water quality, and fish and wildlife habitat. We also seek local flexibility – we need to know as soon as possible the level of cleanup the EPA deems necessary, and we seek flexibility at the local level to determine the best way to achieve the designated level of cleanup.

Metro also owns Willamette Cove, a riverfront property within the Portland Harbor. Metro is working in a longstanding partnership with the Port of Portland to ensure Willamette Cove contributes to an appropriate and timely cleanup of the Portland Harbor and to the restoration and economic success of the area.

As the Environmental Protection Agency knows, clean air and clean water do not stop at city limits or county lines. Neither does the need for jobs, a thriving economy, and sustainable transportation and living choices for people and businesses in the Portland region.

Since 1995, the people of greater Portland voted three times to direct Metro to invest in the purchase and protection of natural areas to support clean water, healthy fish and wildlife habitat and opportunities to connect with nature. The Willamette River is a specific priority for voters.

While we recognize EPA's focus on the 11-mile section of the lower Willamette River, we ask everyone involved to remember that clean up and mitigation actions will be taking place within the context of a larger, interconnected environmental, cultural and economic system that extends through much of the Pacific Northwest.

For example, every salmon migrating to and from every tributary of the Willamette River (and many Columbia River tributaries) must pass through the lower Willamette River. Similarly, the Portland Harbor is an important source of jobs and competitive advantages for the Portland area and the entire State of Oregon. The Working Waterfront Coalition estimates 10 out of every

74 jobs in the City of Portland are located in or supported by the work done in the Portland Harbor area. And the benefits don't stop at Portland's boundary.

In addition to the environmental imperative of cleaning up the Portland Harbor, there are human health impacts as well. Fish that migrate through or reside near the harbor have been shown to contain levels of contaminants unsafe for human consumption. Many residents of the region continue to fish in these waters, however, as a vital source of food and as a cultural tradition. Anecdotal evidence shows that large numbers of Eastern European, Asian, African American, Latino and Native Americans fish in the Willamette River. It is not enough to simply plan to "educate" the public not to consume the fish but rather we have an obligation to ensure reduction of health risks for all the people of the region, especially those from the most vulnerable communities.

Given the regional importance of the Portland Harbor from both an environmental and economic perspective, the Metro Council reiterates that the most important contribution EPA can make is to provide certainty about the level of cleanup required.

By making a timely decision, EPA will help Metro and its public and private sector partners move forward with a clearer idea of what is required and what is possible. More than anything, the cost of uncertainty is hindering the actions we all agree are needed to ensure a healthy economic and environmental future for the Portland region.

Similarly, we believe the public and private sector partners working on Portland Harbor are well positioned to find the most cost- and environmentally-effective actions required to achieve EPA's clean up requirements. By creating certainty about the "what" aspects of the cleanup and flexibility around the "how" EPA will unleash local creativity and innovation that likely will speed results, achieve more and cost less.

Because we have not been as directly involved in the technical assessment of the site, we offer some principles that we hope will help EPA arrive at a plan that meets the Portland region's needs and that will guide and ensure accountability for locally-managed clean up actions:

1. The plan should ensure the jobs, economic benefits and other opportunities associated with the cleanup accrue to underserved communities and communities of color that have been impacted by contamination and reduced access in Portland Harbor.
2. The plan should protect and enhance existing fish and wildlife populations and habitats.
3. Cleanup actions should reconnect existing and potentially favorable habitats.
4. Cleanup and management of contaminated materials should support restoration and protection of processes that maintain watershed health – normative hydrology, functioning physical habitat, improved water quality, and healthy native biological communities.
5. Where natural processes meet cleanup goals in a timely way, use them.
6. Addressing existing businesses' operational needs should be a priority.
7. Significant future industrial use of the river must be assumed.
8. Cleanup actions should support improved human access to the river where it is consistent with ecological and economic needs.
9. In the interim, the plan should call for an increase in culturally specific education and outreach to communities disproportionately impacted by the consumption of contaminated fish.

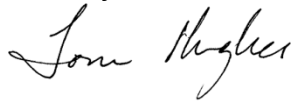
The Metro Council is committed to helping EPA achieve its mission in the Portland Harbor. We will continue to partner with the Port of Portland and others to ensure our property, Willamette Cove,

contributes to a timely and effective cleanup. We also will continue to participate actively in ensuring that all of our operations continue to have positive impacts on the Willamette River, its uplands and tributaries.

Thank you for your leadership in helping the Portland region address the challenge of cleaning up the Portland Harbor. As elected representatives of more than 1.5 million people who live and work in the Portland region, we urge EPA to make a speedy and thoughtful decision about the level of cleanup required. We also urge EPA to rely on local leadership, combined with federal, tribal, state and local oversight, to design and implement the specific actions required to achieve the desired level of cleanup.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Hughes". The signature is written in a cursive, flowing style.

Metro Council President
On behalf of the Metro Council